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May 13, 2022

**VIA ECF**

Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *In re Search Warrant dated November 5, 2021*,  
Case No. 21-MC-00813 (AT)



National Office  
125 Broad Street, 18th floor  
New York NY 10004  
(212) 549-2500  
aclu.org

Dear Judge Torres,

The American Civil Liberties Union (“ACLU”) respectfully moves for leave to file the accompanying *amicus curiae* letter in support of Intervenor Reporters Committee for Freedom of the Press’s Objections, ECF No. 49, to Magistrate Judge Cave’s Opinion and Order of December 7, 2021, ECF No. 47.

The ACLU is a nationwide, nonprofit, nonpartisan organization dedicated to the principles of liberty and equality embodied in the Constitution and our nation’s civil rights laws. The ACLU frequently appears in courts throughout the countries, as counsel to parties or as *amicus*, to defend the public right of access to court proceedings and filings. The proper resolution of the motion to unseal in this case is a matter of substantial interest to the ACLU and its members.

Intervenor Reporters Committee for Freedom of the Press consents to this motion. Project Veritas and James O’Keefe do not object to this motion. The Government does not object to this motion, but requests the opportunity to submit a response, if needed, within 30 days of the filing of the ACLU’s *amicus curiae* letter. The ACLU consents to the Government’s request.

GRANTED. By **June 24, 2022**, the Government shall file a consolidated opposition to the *amicus* brief, and the Reporters Committee's objections, *see* ECF No. 49.

SO ORDERED.

Dated: May 24, 2022  
New York, New York

A handwritten signature in black ink, appearing to be "AT" or a stylized version of the name Analisa Torres.

ANALISA TORRES  
United States District Judge